MARPOL Annex VI Regulation 18.2, as incorporated by reference in 40 C.F.R. § 1043.100, provides that a vessel not in compliance with the fuel oil sulfur standards will:

"(1) present a record of the actions taken to attempt to achieve compliance; and

(2) provide evidence that it attempted to purchase compliant fuel oil in accordance with its voyage plan and, if it was not made available where planned, that attempts were made to locate alternative sources for such fuel oil and that despite best efforts to obtain compliant fuel oil, no such fuel oil was made available for purchase."

Vessel's Name:
Vessel's Flag:
Identification Number:
(IMO or other)

Voyage Plan

Port of Origin:
Port of Destination:
First U.S. Port of Arrival:

List of all port visits beginning with the Port of Origin and ending at Port of Destination:

1. **Port of Origin:**
2nd Port Visit:
3rd Port Visit:
4th Port Visit:
5th Port Visit:
6th Port Visit:
7th Port Visit:
8th Port Visit:
9th Port Visit:
10th Port Visit:

(Insert more as needed)

Date and Time Vessel Received Notice it would transit the NA-ECA:
Location of Vessel when notice was received it would transit the NA-ECA:

Date and Time vessel is expected to enter the NA-ECA:
Date and Time vessel is expected to exit the NA-ECA:
Projected number of days the main propulsion engines will be operated in the NA-ECA:

Sulfur Content of Fuel Oil used when entering the NA-ECA:
Sulfur Content of Fuel Oil used while operating in the NA-ECA:

A description of the actions taken to attempt to achieve compliance prior to entering the North American ECA, including a c
and a description of the reason why compliant fuel oil was not available (e.g., compliant fuel oil was not available at ports o
Note: The United States government does not consider the cost of compliant fuel oil to be a valid basis for claiming the non
contacted and the dates on which the contact was made.

Enter Text Here: AT THE TIME THE VESSEL ENTERED THE NA-ECA THE VESSEL HAS COMPLIANT FUEL. ONLY WHEN WE REPL
OUR LSFO AT HOUSTON, TEXAS THAT WE RECEIVE THIS NON-COMPLIANT LSFO.

THE COMPANY IS WILLING TO SUPPLY COMPLIANT FUEL HOWEVER, WE HAVE NO MORE STORAGE TANK AVAILABLE.

WE ORDERED LSFO FOR BUNKERING AT HOUSTON. AT THE TIME WE WERE EXPECTING A COMPLIANT FUEL WILL BE SUPPLI
LEARNED THAT THE SULPHUR CONTENT OF THE SUPPLIED FUEL WAS NOT IN COMPLIANCE. PLEASE REFER TO THE ANALYSIS

FROM
VISWA LAB

TO
TEMM MARITIME CO. LTD.

ATTN: MR. Y. IWAI, DIRECTOR

Vessel Name : ORANGE ISLAND(IMO No: 9401958)
VLC Log No : H140693991
Place & Date Sent : HOUSTON, UNITED STATES ; 09-Jun-2014
Date Received at VL : 10-Jun-2014

CUSTOMER FURNISHED DATA:

Bunker Port & Date : HOUSTON-UNITED STATES ; 07-Jun-2014
Bunker Supplier : NuSTAR ENERGY SERVICES, INC.
Barge : GRUBER SEA
Sample Grade : IFO380-RMG380LS
Sample Seal No : 0625264 - Sealed
Bunker Quantity : 240.000 MT
Bunker Density @15Â°C : 984.1 kg/m3
Bunker Viscosity @50Â°C : 239.9 cSt
Sulphur Content : 0.98 %
Source of the sample : MANIFOLD
Sampling Method : DRIP

SPECIFIED PARAMETERS FOR IFO380-RMG380LS & TEST RESULTS

Parameters	Units	Test Results	Specification Limits
Density @ 15Â°C	kg/m3	984.4	(991.0 Max)
viscosity @50Â°C	cSt	301.0	(380.0 Max)
Upper Pour Point	Â°C	3	(30 Max)
Carbon Residue	% (mass)	8.94	(18.00 Max)
Ash	% (mass)	0.020	(0.150 Max)
Water	% (vol)	0.10	(0.50 Max)
Sulphur	% (mass)	1.36	(1.00 Max)
Total Sediment Pot.	% (mass)	0.02	(0.10 Max)
Vanadium	ppm	34	(300 Max)
Al + Si	ppm	30	(80 Max)
Flash Point	Â°C	> 70	(60 Min)
Calcium	ppm	11	(- Max)
Zinc	ppm	< 1	(- Max)
Phosphorus	ppm	< 1	(- Max)

ADDITIONAL PARAMETERS

Parameters	Test Results	Units
viscosity @100Â°C	30.3	cSt
API Gravity	12.16	

Sodium	17	ppm
Aluminium	14	ppm
Silicon	15	ppm
Iron	16	ppm
Lead	< 1	ppm
Nickel	8	ppm
Magnesium	< 1	ppm
Potassium	8	ppm

CALCULATED VALUES

Parameters	Computed Val	Units
Net specific energy	40.81	MJ/kg
Gross specific energy	43.14	MJ/kg
CCAI	848	
Temperature at injection (for 13 cSt)	130	Â°C
Minimum Transfer Temperature	40	Â°C

CONFORMANCE:

Sulfur content does not meet the requirement for 1% low sulfur fuel (Marpol Annex VI) to be used in ECA.

COMMENTS:

Viscosity was confirmed by repeated analysis.

Sulfur was confirmed by repeated analysis.

SUGGESTIONS & RECOMMENDATIONS TO SHIP OWNERS/OPERATORS/TECHNICAL STAFF

Temperature for injection viscosity of 8 cst is 152Â°C.
Temperature for injection viscosity of 10 cst is 141Â°C.
Temperature for injection viscosity of 11 cst is 137Â°C.
Temperature for injection viscosity of 12 cst is 133Â°C.
Temperature for injection viscosity of 13 cst is 130Â°C.
Temperature for injection viscosity of 15 cst is 124Â°C.
Temperature for injection viscosity of 18 cst is 117Â°C.
Temperature for injection viscosity of 20 cst is 113Â°C.

POUR POINT

Observation:

Heat and store this fuel at 10Â°C above the measured pour point temperature.

SULFUR

Observation: This fuel has low sulfur.

High alkalinity of some cylinder oils can cause scuffing and excess wear of cylinder liners.

Make sure cylinder oil used can handle low sulfur fuel.

CCAI

Observation: Ignition delay is indicated by CCAI greater than 840 for medium-speed engines and greater than 870 for low-s

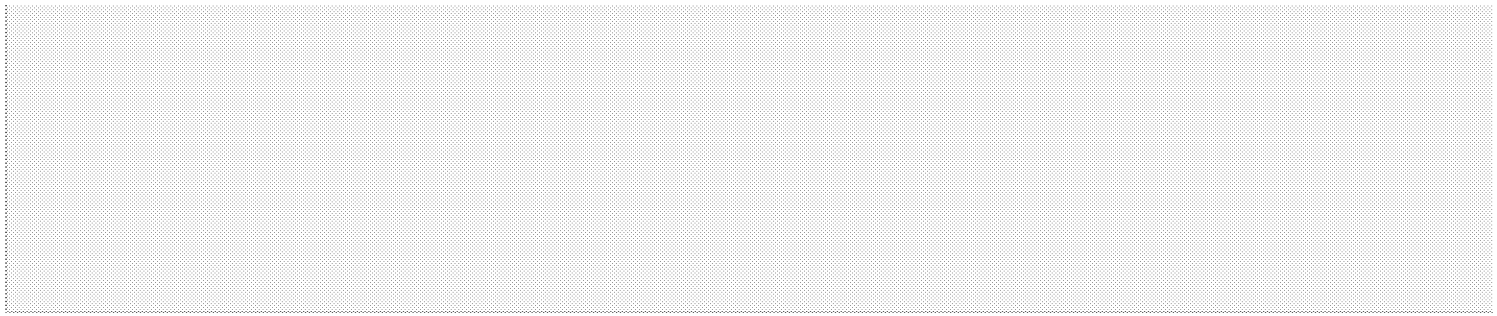
Questions?

Viswa Lab Houston; Tel - +1 713 842 1985; Email - customerhelp@viswalab.com

Viswa Lab Singapore; Tel - +65 6778 7975; Email - singapore@viswalab.com

REPORT PREPARED AND APPROVED BY VISWA LAB TECHNICAL DEPARTMENT.

Viswa Lab Houston is an ISO 17025 laboratory accredited by Perry Johnson Laboratory Accreditation Inc, Certificate# L11-21



In cases of fuel oil supply disruption, the name of the port at which the vessel was scheduled to receive compliant fuel oil
oil.

Enter Text Here: AT THE MOMENT, WE HAVE NOT BEEN ADVISED BY OUR COMPANY TO TAKE IN ANOTHER BATCH OF BUNK

If applicable, identify and describe any operational constraints that prevented you from using available compliant fuel oil, fo
or are taking, to resolve these operational constraints that will allow you to use all commercially available residual fuel oil bl

Enter Text Here:

If applicable, identify and describe any operational constraints that prevented you from using available compliant fuel oil, fo
or are taking, to resolve these operational constraints that will allow you to use all commercially available residual fuel oil bl

EnterSUGGESTIONS & RECOMMENDATIONS TO SHIP OWNERS/OPERATORS/TECHNICAL STAFF
Temperature for injection viscosity of 8 cst is 152Â°C.
Temperature for injection viscosity of 10 cst is 141Â°C.
Temperature for injection viscosity of 11 cst is 137Â°C.
Temperature for injection viscosity of 12 cst is 133Â°C.
Temperature for injection viscosity of 13 cst is 130Â°C.
Temperature for injection viscosity of 15 cst is 124Â°C.
Temperature for injection viscosity of 18 cst is 117Â°C.
Temperature for injection viscosity of 20 cst is 113Â°C.
Text Here:

Describe the availability of compliant fuel oil at the first port-of-call in the United States, and your plans to obtain that fuel o

Enter Text Here: WE'LL SUGGEST TO MY OWNER TO USE DIESEL OIL INSTEAD.

If compliant fuel oil is not available at the first port-of-call in the United States, describe the lowest sulfur content of availabl
States.

Enter Text Here:
1.2%

If the vessel has operated in the North American ECA in the prior 12 months, provide the names of all U.S. ports visited, the

Enter Text Here: NOT APPLICABLE

If the vessel or owner/operator has submitted a Fuel Oil Non-Availability Report to the United States government in the pre
submitted, and provide details on the dates and ports previously visited while using non-compliant fuel oil.

Enter Text Here: NOT APPLICABLE

Provide all relevant contact information, including the ship master, ship operator, legal agent in the United States, ship own
authorized to answer additional questions relating to claims of fuel oil unavailability and his or her full contact information.

Enter Text Here:
Jason Schwab
Blue Water Shipping Co.
504-228-9619
schwab@bluewatershipping.com

T. Parker Host, Inc.
As Agents Only
365 Canal Street, Suite 2500
New Orleans, LA 70130
504-469-0731
www.tparkerhost.com<http://www.tparkerhost.com/>

Fuel Oil Non-Availability Report

North American Emmissions Control Area (NA-ECA)

M.V. ORANGE ISLAND
PANAMA
IMO NO. 9401958

(Note: This plan should reflect what is in effect at the time of the vessel's entry into the North American ECA)

ANTWERP, BELGIUM
NEW LONDON
NEW LONDON

NEW LONDON, CONNECTICUT
HOUSTON, TEXAS
INGLESIDE, CORPUS CHRISTI
NEW ORLEANS, LOUISIANA

17 MAY 2014 / 1500 HRS
42-05.2 N / 044-08.3 W

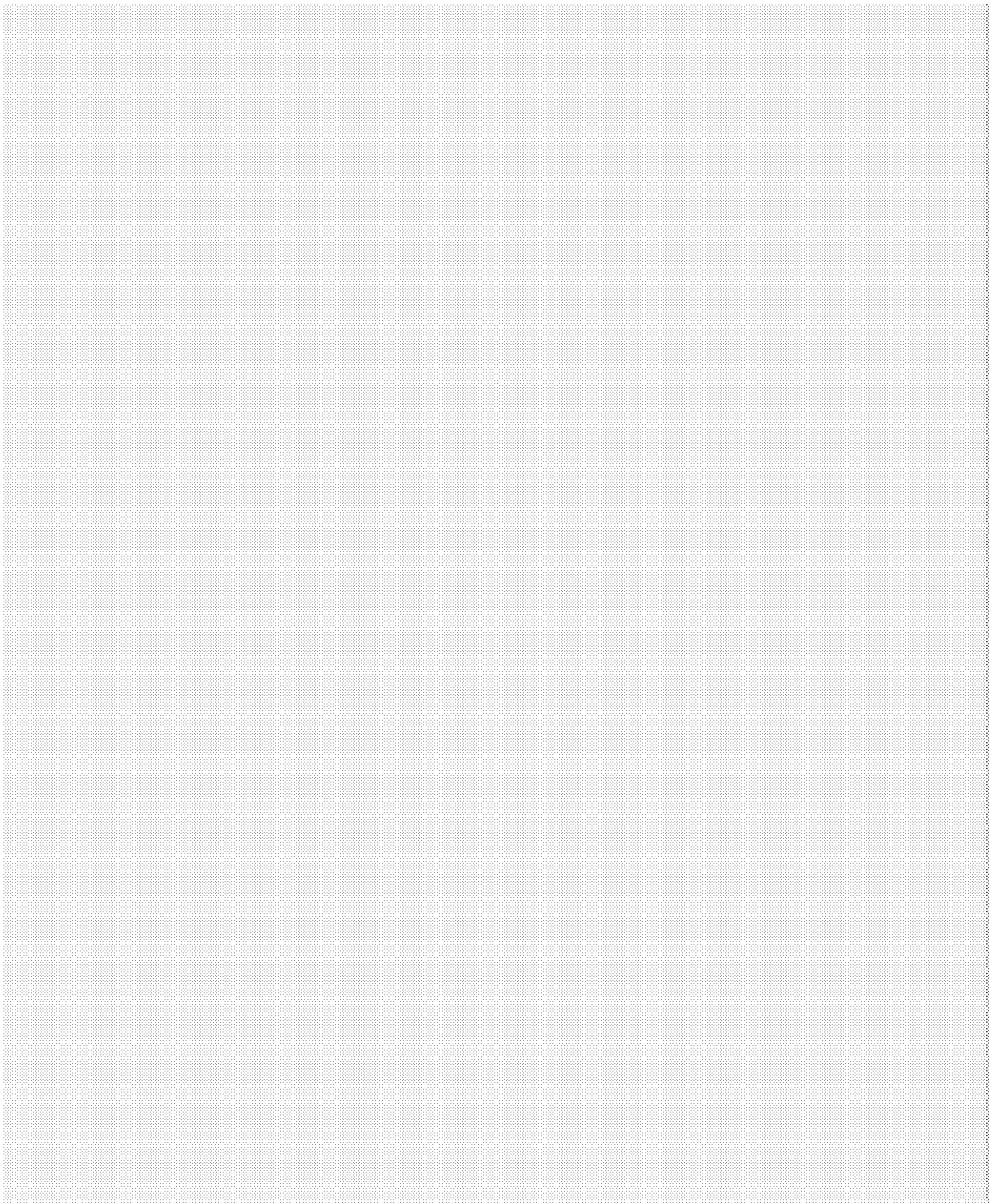
24 MAY 2014 / 1300 HRS
21 JUNE 2014 / 1200 HRS
5 DAYS

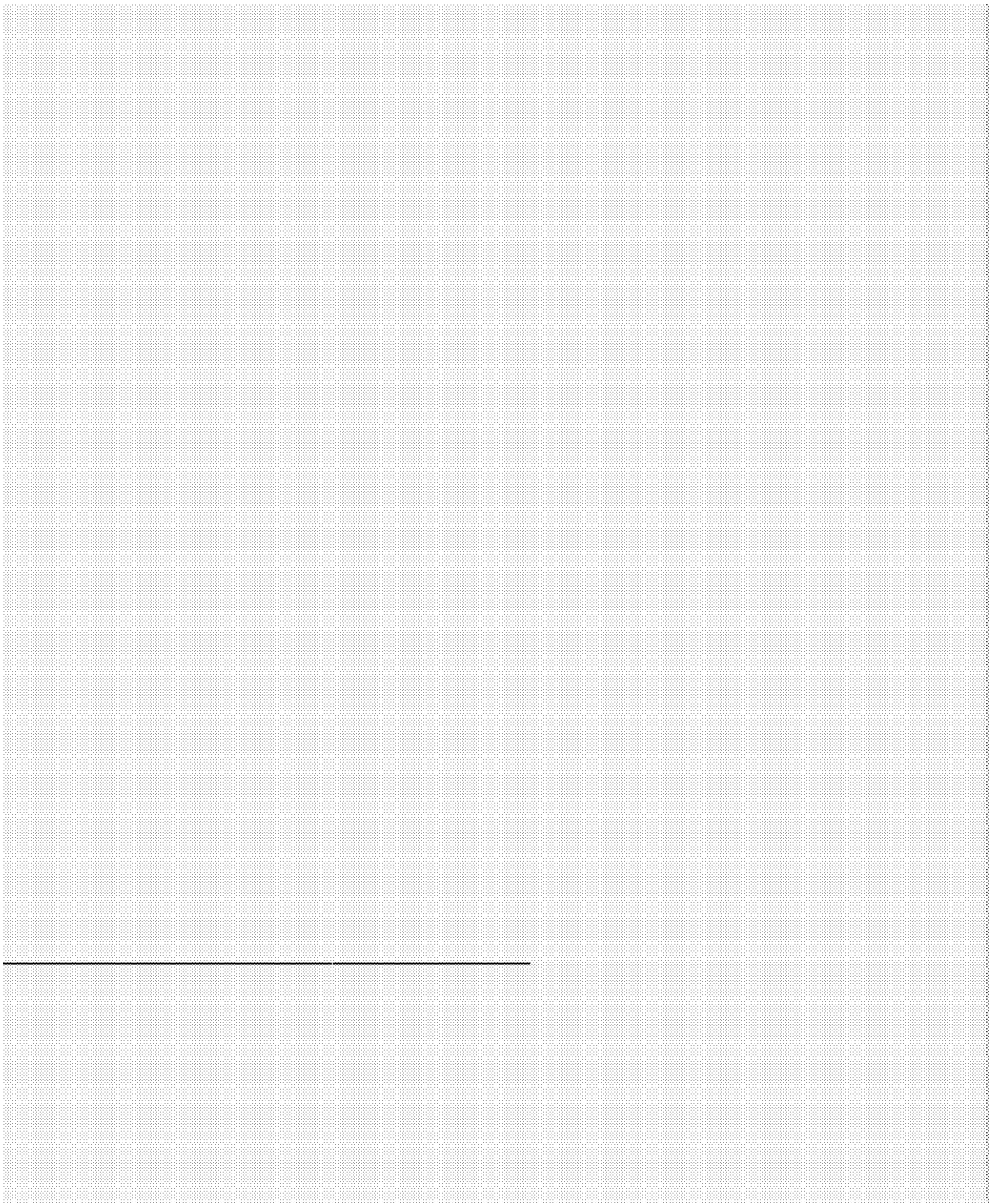
0.99%
1.36%

description of all attempts that were made to locate alternative sources of compliant fuel oil,
n "intended voyage;" fuel oil supply disruptions at port; etc.
-availability of compliant fuel oil). Include names and addresses of the fuel oil suppliers

ENISH

IED TO THE VESSEL. ONLY ON 11TH JUNE THAT WE RCVD THE FUEL ANALYSIS REPORT THAT WE
5 REPORT BELOW FROM VISWA LAB.

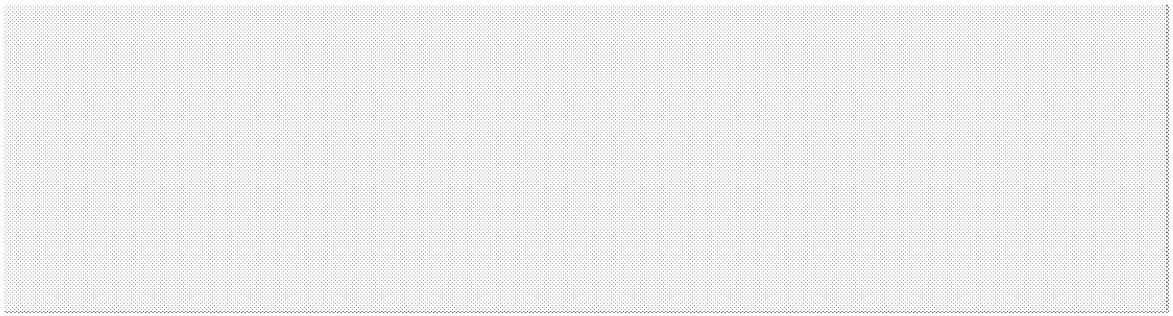




speed engines.

e on the information or advice in this document or however provided, unless that person has
y is exclusively on the terms and conditions set out in that contract.

12.



and the name of the fuel oil supplier that is now reporting the non-availability of compliant fuel

KERING.

r example with respect to viscosity or other fuel oil parameters. Specify steps you have taken,
lends.

r example with respect to viscosity or other fuel oil parameters. Specify steps you have taken, lends.

il.

le fuel oil, or the lowest sulfur content of available fuel oil at the next port-of-call in the United

dates of the port calls, and whether the vessel used compliant fuel oil.

vious 12 months, identify the number of Fuel- Oil Non-Availability Reports previously

er, and any related parent companies. Also include a designated corporate official who is

The United States government will consider the information submitted in a Fuel Oil Non- Availability Report to be reliable or following affirmation:

"I certify under penalty of law that the statements and information made herein are, to the best of my knowledge and be submitting false statements and information, including the possibility of fines and imprisonment pursuant to 18 U.S.C. § 1

Signed:

_____

Authorized Company Representative

This completed and signed report should be sent to:

1. In the United States by email to:

2. To the vessel's Flag State Administrator

nly if the report is signed by an authorized representative of your company and contains the

lief, true and complete. I am aware that there are significant penalties for knowingly
001."

marine-eca@epa.gov